UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

Children's Health Defense, Robert F. Kennedy, Jr., Trialsite, Inc., Creative Destruction Media, LLC, Erin Elizabeth Finn, Jim Hoft, Dr. Ben Tapper, Ben Swann, Dr. Joseph Mercola, Ty Bollinger, and Charlene Bollinger,

Plaintiffs,

— against —

WP Company, LLC (D/B/A The Washington Post), The British Broadcasting Corp., and The Associated Press & Reuters,

Defendants.

No. 2:23-cv-00004-Z (MJK)

The British Broadcasting Corporation's Motion to Dismiss

Defendant The British Broadcasting Corporation ("BBC") files this Motion to Dismiss pursuant to Rule 12(b)(2) and 12(b)(6) and requests that the Court dismiss the BBC from the action with prejudice.

Pursuant to Local Rules 7.1 and 7.2, this motion is accompanied by: (i) a Brief that sets forth the BBC's supporting arguments and authorities, and (ii) an Appendix that contains the Declaration of Jonathan Munro. A proposed order will be emailed to Chambers.

WHEREFORE, the BBC requests that the Court dismiss the BBC from the action with prejudice and grant further relief as the Court deems just and proper.

Respectfully Submitted:

Dated: April 18, 2023

Dallas, Texas

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